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Attorneys for Defendant

STATE FARM GENERAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WILLIAM TONG; and MALINEE
DIBBAYAWAN,

Plaintiffs,

vs.

STATE FARM GENERAL
INSURANCE COMPANY; and DOES
1 to 10,

Defendants.

) Case No.: 2:24-cv-02219-DSF-MAR

) **DISCOVERY MATTER**

) Magistrate Judge Margo A. Rocconi

) **DECLARATION OF DANIEL T.**

) **BALMAT IN SUPPORT OF**

) **DEFENDANT STATE FARM**

) **GENERAL INSURANCE**

) **COMPANY'S MOTION TO ENTER**

) **PROTECTIVE ORDER**

) Date: January 15, 2025

) Time: 11:00 a.m.

) Courtroom: 790

) Discovery Cutoff: 5/12/25

) Pre-Trial Conference: 9/8/25

) Trial: 10/7/25

) Complaint filed: March 19, 2024

I, DANIEL BALMAT, declare the following:

1. I am an attorney licensed to practice before this Court, and an

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1 associate with the law firm of Pacific Law Partners, LLP. My firm has been
2 retained to represent Defendant State Farm General Insurance Company (“State
3 Farm”) in this matter. I am one of the primary attorneys handling this file and
4 can attest to the facts stated herein from my own personal knowledge and
5 pursuant to my review of the file.

6 2. A true and correct copy of State Farm’s Responses to Plaintiffs’
7 Requests for Production, Set One, are attached hereto as **Exhibit A**.

8 3. A true and correct copy of State Farm’s Responses to Plaintiffs’
9 Requests for Production, Set One, are attached hereto as **Exhibit B**.

10 4. A true and correct copy of State Farm’s Responses to Plaintiffs’
11 Requests for Production, Set One, are attached hereto as **Exhibit C**.

12 5. Plaintiffs have proposed using this Court’s model protected order,
13 unchanged except for the caption page. A true and correct copy of an e-mail
14 from plaintiffs’ counsel dated August 21, 2024, is attached hereto as **Exhibit D**.

15 6. On September 17, 2024, State Farm provided its revisions to the
16 Court’s model protective order to the Plaintiffs. Minutes later, Plaintiffs rejected
17 these revisions. A true and correct copy of an e-mail string reflecting the
18 foregoing is attached hereto as **Exhibit E**.

19 7. A true and correct copy of the model order as revised by State Farm
20 and transmitted to Plaintiffs on September 17, 2024, is attached hereto as **Exhibit**
21 **F**.

22 8. After additional meet and confer efforts, State Farm provided
23 another version of the modified order. However, Plaintiffs once again rejected
24 these modifications out of hand, maintaining State Farm’s revisions were
25 improper – without specifying how – and because the Court ostensibly “prefers”
26 the model order. A true and correct copy of an e-mail string dated October 30,
27 2024, reflecting the foregoing is attached hereto as **Exhibit G**.

28 9. A true and correct copy of the Proposed Stipulated Protective Order

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1 showing State Farm’s modifications is attached hereto as **Exhibit H**.

2 10. A true and correct copy of a subpoena issued in this case by
3 Plaintiffs to attorney Sander Dawson (the “Subpoena”) is attached hereto as
4 **Exhibit I**.

5 11. State Farm objected to the Subpoena on the ground that it did not
6 seek attorney Dawson’s records but instead sought confidential documents State
7 Farm produced to attorney Dawson pursuant to the protective order in the *Mojica*
8 action. A true and correct copy of letter from me to Plaintiffs’ counsel dated
9 September 18, 2024, reflecting the foregoing is attached hereto as **Exhibit J**.

10 12. State Farm also emphasized that its revisions to the model order
11 were necessary to ensure compliance, based on its understanding that Plaintiffs’
12 counsel had failed to comply with protective orders in other cases. In response,
13 Plaintiffs’ counsel claimed ignorance as to what violations State Farm’s counsel
14 referred. A true and correct copy of an e-mail string dated September 20, 2024,
15 reflecting the foregoing is attached hereto as **Exhibit K**.

16 13. A true and correct copy of an e-mail from Plaintiffs’ counsel on
17 which I was copied, dated September 25, 2024, is attached hereto as **Exhibit L**.

18 14. A true and correct copy of an e-mail string between Plaintiffs’
19 counsel and me dated September 25, 2024, is attached hereto as **Exhibit M**.

20 15. A copy of the protective order proposed by State Farm – without
21 redline – is attached hereto as **Exhibit N**.

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct, and that this declaration was
24 executed on November 25, 2025, at Pleasant Hill, California.

25
26 /s/DANIEL T. BALMAT
27 DANIEL T. BALMAT
28